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March 2, 2020

## VIA ECF

Hon. Naomi Reice Buchwald, U.S.D.J.  
United States District Court  
Southern District of New York  
500 Pearl Street  
New York, New York 10007-1312

**Re: *Cesari S.R.L. v. Peju Province Winery L.P. et al.***  
**Case No. 17-cv-00873 (NRB)**

Dear Judge Buchwald:

We are counsel to Peju Province Winery L.P., Peju Family Operating Partnership, L.P., and Peju Province Corporation (collectively, "Peju" or "defendants") in connection with the above-captioned matter. We write to the Court pursuant to Fed. R. Civ. P. 6(b)(1)(A), and § 1(E) of Your Honor's Individual Practices in response to the Court's order dated February 24, 2020 (Dkt. No. 191). More specifically, defendants write to request a brief adjournment of the status conference currently scheduled for March 23, 2020 at 2:45 p.m. (*Id.*)

Pursuant to Fed. R. Civ. P. 6(b)(1)(A), defendants submit good cause exists for a brief adjournment. The undersigned is scheduled to be in attendance and presenting at a conference on March 23, 2020, which has been scheduled for months.

In further compliance with § 1(E) of Your Honor's Individual Practices, defendants further note as follows:

1. No prior request has been made to adjourn the above-referenced status conference date; and
2. Plaintiff consents to this request.

The  
conference  
is adjourned  
until March  
31, 2020 at  
3:30 pm

As ordered  
Naomi Reice  
Buchwald,  
U.S.D.J.  
3/2/20



The parties have been in communication following the Court's order and are available for a status conference on any of the following dates subject to the Court's availability: March 26th, 27th, 30th or 31st, 2020.

Accordingly, for the foregoing reasons, defendants respectfully request the status conference currently scheduled for March 23, 2020 at 2:45 p.m. be adjourned for good cause.

Respectfully submitted,

Joel G. MacMull

cc: All Counsel of Record (*via ECF only*)